

1 HONORABLE BENJAMIN H. SETTLE
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 AMRISH RAJAGOPALAN, on behalf of
himself and all others similarly situated,

11 Plaintiff,

12 v.

13 NOTEWORLD, LLC,

14 Defendant.

15 MARIE JOHNSON-PEREDO and ROBERT
16 HEWSON on behalf of themselves and all
17 others similarly situated,

18 Plaintiffs,

19 v.

20 MERACORD, LLC; LINDA REMSBERG
21 and CHARLES REMSBERG, individually
22 and on behalf of the marital community,

23 Defendants.

CASE NO. 3:12-CV-05657-BHS

**STIPULATED MOTION TO STAY
RULING ON CERTAIN PENDING
MOTIONS AND EXTENDING TIME
FOR PLAINTIFFS TO FILE A
CONSOLIDATED AMENDED
COMPLAINT**

Noted: August 5, 2013

24 WHEREAS, on June 20, 2013, Plaintiff Dinah Canada filed a *Motion for Attorneys' Fees*
25 (Dkt. 123) and this motion has not been decided by the Court;

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STIPULATED MOTION TO STAY RULING ON CERTAIN
PENDING MOTIONS AND EXTENDING TIME FOR
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COMPLAINT- 1

WHEREAS, on June 20, 2013, Defendant Meracord LLC filed a *Motion for Interlocutory Certification Under 28 U.S.C. § 1292(b) of the Court's Order at Docket No. 117* (Dkt. 126) and this motion has not been decided by the Court;

WHEREAS Plaintiffs' Consolidated Amended Complaint is currently due on August 9, 2013 pursuant to the Court's June 17, 2013 Order (Dkt. 122);

WHEREAS, the parties have been engaged and intend to engage in meaningful settlement discussions, and believe that settlement or mediation of this dispute is in the best interest of all parties;

NOW, THEREFORE, pursuant to Local Rule 7(d)(1) and Local Rule 10(g), the parties in the above-captioned consolidated action hereby stipulate and agree and request the Court to stay ruling on and hold in abeyance Plaintiff Canada's Motion for Attorney's Fees and Defendant Meracord LLC's Motion for Interlocutory Certification Under 28 U.S.C. § 1292(b) of the Court's Order at Docket No. 117 until the parties submit notice to the Court that this stay is no longer necessary, or until further order of Court; and the parties further agree to extend the deadline for Plaintiffs to file their Consolidated Amended Complaint to not later than October 9, 2013.

A proposed Order follows the parties' signatures.

Respectfully submitted this 5th day of August, 2013.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

s/ Thomas E. Loeser

Steve W. Berman

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STIPULATED MOTION TO STAY RULING ON CERTAIN PENDING MOTIONS AND EXTENDING TIME FOR PLAINTIFFS TO FILE A CONSOLIDATED AMENDED COMPLAINT- 2

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STIPULATED MOTION TO STAY RULING ON CERTAIN PENDING MOTIONS AND EXTENDING TIME FOR PLAINTIFFS TO FILE A CONSOLIDATED AMENDED COMPLAINT- 3

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED this 12 day of August, 2013.

BENJAMIN H. SETTLE
UNITED STATES DISTRICT JUDGE

STIPULATED MOTION TO STAY RULING ON CERTAIN PENDING MOTIONS AND EXTENDING TIME FOR PLAINTIFFS TO FILE A CONSOLIDATED AMENDED COMPLAINT- 4